

INDICTMENT NO.
2012CR00116-9
CLAYTON SUPERIOR COURT
November Term, 2011

PLEA

The Defendant waives formal arraignment,
copy of indictment / accusation, list of
witnesses, and waives indictment by the
Grand Jury where applicable, and also
waives
trial by jury and pleads:

GUILTY NOT GUILTY

STATE OF GEORGIA
v.
VICTOR KEITH HILL

This _____ day of _____, _____

Cts. 1-4: Violation of Racketeer
Influenced and Corrupt Organizations
Act (R.I.C.O.)
Cts. 5-30: Theft by Taking
Cts. 31-32: Making a False Statement
Cts. 33-35: Theft by Taking
Ct. 36: Violation of Oath by Public
Officer
Ct. 37: Influencing a Witness

Defendant

Defendant's Attorney

District Attorney

Bill

VERDICT

We, the Jury, find the Defendant:

Foreperson

SPECIAL PRESENTMENT

This _____ day of _____, _____

TRACY GRAHAM LAWSON
DISTRICT ATTORNEY

Foreperson

**STATE OF GEORGIA
CLAYTON COUNTY**

BILL OF INDICTMENT

IN THE SUPERIOR COURT OF SAID COUNTY

The Grand Jurors selected, chosen, and sworn for the County of CLAYTON, to-wit:

Justin Sullivan, Foreperson	
William H. Davidson, Jr.	Susan Tredway
Beatrice Montgomery	Judith Laseter
Mike Klingshirn	C.W. Massey
Sharon Rhodes	Hugh Burnett
Angela Dennis	Brad Marks
Ben Rivers	Michael Williams
Amanda Brand	Marlon Grant
Cheryl Young	B.J. Marks
Mary Hart	Randy Hallford
Amie Jennings	Ray Kummer
Joel Smith	Demetria Jennings

COUNT I

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of: VIOLATION OF RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT

for that the said accused between the 1st day of January, 2007, and the 31st day of December, 2008, in Clayton County, Georgia, did then and there:

through a Pattern of Racketeering Activity, acquire and maintain, directly and indirectly, an interest in and control of an Enterprise, real property, and personal property including United States currency, in violation of O.C.G.A. 16-14-4(a), contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT ONE of this Bill of Indictment expressly incorporates by reference, as if fully set forth herein, the allegations of the ENTERPRISE, the PATTERN OF RACKETEERING ACTIVITY, and the ACTS OF RACKETEERING ACTIVITY as enumerated in pages 5 through 13 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 2

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of: VIOLATION OF RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT

for that the said accused between the 1st day of January, 2007, and the 31st day of December, 2008, in Clayton County, Georgia, did then and there:

associate with an Enterprise and did, through a Pattern of Racketeering Activity, directly and indirectly conduct and participate in the Enterprise, in violation of O.C.G.A. 16-14-4(b) contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT TWO of this Bill of Indictment expressly incorporates by reference, as if fully set forth therein, the allegations of the ENTERPRISE, the PATTERN OF RACKETEERING ACTIVITY, and the ACTS OF RACKETEERING ACTIVITY as enumerated in pages 5 through 13 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

THE ENTERPRISE: THE CLAYTON COUNTY SHERIFF'S OFFICE

Between January 1, 2007 and December 31, 2008, Victor Keith Hill served as elected Sheriff of Clayton County. During this time, Victor Keith Hill, acting through a PATTERN OF RACKETEERING ACTIVITY, maintained control of an ENTERPRISE, the Clayton County Sheriff's Office, a governmental entity. Victor Keith Hill maintained an interest in and control of the ENTERPRISE in Clayton County during the above dates.

Among the duties of the Sheriff are: maintaining the county jail, caring for and housing prisoners, transporting prisoners to and from court and other correctional facilities, serving arrest warrants, providing courthouse security, providing deputies to serve as bailiffs in judicial proceedings, and the approval of and receipt of bail bonds.

Although all employees of the Clayton County Sheriff's Office, regardless of position, rank or years of service, are civil service employees pursuant to Clayton County Civil Service System Act, Ga. L. 1994, the Sheriff has the authority to hire whomever he wishes. While the Clayton County Sheriff's Office is a paramilitary organization with a chain of command, the Sheriff may override any recommendation for discipline of an employee and may remove an individual from a position where they report to the "chain of command," making that employee report directly to the Sheriff.

THE PATTERN OF RACKETEERING ACTIVITY

Victor Keith Hill engaged in an interrelated pattern of criminal activity motivated by and the effect of which was pecuniary gain.

While serving as Sheriff of Clayton County, Victor Keith Hill engaged in at least two ACTS OF RACKETEERING ACTIVITY, as defined by Official Code of Georgia Annotated (OCGA) §§ 16-14-3(8), 16-14-3(9)(A), and 16-14-3(9)(B), and as enumerated below.

PECUNIARY GAIN

Victor Keith Hill, through the **PATTERN OF RACKETEERING ACTIVITY** and proceeds derived therefrom, acquired and maintained an interest in and control of personal property including money in Clayton County. By virtue of his position as Sheriff of Clayton County, Victor Keith Hill had opportunities, of which he took advantage, through the **PATTERN OF RACKETEERING ACTIVITY**, to obtain money and financial gain.

While serving as Sheriff, Victor Keith Hill conducted the business of the Sheriff in a manner in which he: illegally profited financially from his position as Sheriff through the use of Clayton County Sheriff's Office vehicles and fuel purchased by Clayton County to transport himself on personal trips not legitimately related to the performance of any of Victor Keith Hill's duties as Sheriff; illegally ordered a Sheriff's Office employee to perform personal work on behalf of Victor Keith Hill by ordering the employee to assist in the writing of a book that Victor Keith Hill was writing which was unrelated to his duties as Sheriff, while said employee was on-duty and being paid by Clayton County; illegally profited financially from fundraising events using on-duty Clayton County Sheriff's Office employees, Clayton County Sheriff's Office vehicles, and fuel purchased by Clayton County to conduct said fundraisers when said fundraisers were used to fund the Committee to Reelect Victor Hill campaign account; illegally profited financially from the use of Clayton County funds to pay for a vacation rental in North Georgia; illegally profited from his position as Sheriff by allowing a Sheriff's Office employee to receive payment from Clayton County in the form of "kickbacks" from the company that printed a publication entitled, "The Sheriff's Star," illegally ordered that a Sheriff's Office employee be placed on paid administrative leave so that she could travel with Victor Keith Hill on personal trips and still receive a salary.

All of the crimes and acts charged in **COUNTS ONE AND TWO**, of this Bill of Indictment were committed between January 1, 2007 and December 31, 2008.

At least one of the **ACTS OF RACKETEERING ACTIVITY** occurred in Clayton County.

The **ACTS OF RACKETEERING ACTIVITY** (which, together, establish the **PATTERN OF RACKETEERING ACTIVITY**) engaged in by Victor Keith Hill had the same or similar intents, results, accomplices, victims and methods of commission, and were otherwise interrelated by distinguishing characteristics. The **ACTS OF RACKETEERING ACTIVITY** engaged in by Victor Keith Hill were not isolated incidents, but formed a **PATTERN OF RACKETEERING ACTIVITY** coordinated and directed toward the common objectives of facilitating the exploitation of Victor Keith Hill's position as Sheriff for personal financial gain as well as the financial gain of certain individuals he associated with. The **ACTS OF RACKETEERING ACTIVITY** were further interrelated through Victor Keith Hill's use of Clayton County Sheriff's Office employees and property to commit the **ACTS OF RACKETEERING ACTIVITY**.

CATEGORIES OF THE ACTS OF RACKETEERING ACTIVITY

The ACTS OF RACKETEERING ACTIVITY engaged in by Victor Keith Hill include, but are not limited to:

1. Violations of Article 1 of Chapter 8 of the Criminal Code of Georgia relating to theft (OCGA §16-8-2, THEFT BY TAKING and OCGA §16-8-4, THEFT BY CONVERSION);
2. Violations of OCGA §16-10-20, FALSE STATEMENTS AND WRITINGS, CONCEALMENT OF FACTS, AND FRAUDULENT DOCUMENTS IN MATTERS WITHIN JURISDICTION OF STATE OR POLITICAL SUBDIVISIONS

ACTS OF RACKETEERING ACTIVITY

I. THEFT

The Pattern

While Sheriff of Clayton County, Victor Keith Hill used the property of Clayton County and the labor of its employees as though they were his own personal property. Victor Keith Hill used Clayton County vehicles himself to travel both in-state and out-of-state on personal trips, including vacations, not legitimately related to the performance of his duties as Sheriff. Victor Keith Hill used an on-duty Clayton County Sheriff's Office employee to perform work on a book that Victor Keith Hill was writing, which was unrelated to his duties as Sheriff. Victor Keith Hill also used an on-duty Clayton County Sheriff's Office employee to work on his reelection campaign to include designing a website, postcards, signs, magnets, and other campaign literature using Sheriff's Office offices and equipment. Victor Keith Hill used on-duty Clayton County Sheriff's Office employees, Clayton County Sheriff's Office vehicles, and fuel purchased by Clayton County to conduct fundraisers when said fundraisers were used to fund the Committee to Reelect Victor Keith Hill campaign account. Victor Keith Hill used Clayton County funds to pay for a vacation rental in North Georgia which was for a personal trip and unrelated to his duties as Sheriff. Victor Keith Hill allowed a Sheriff's Office employee to receive payment from Clayton County in the form of "kickbacks" from the company that printed a publication entitled, "The Sheriff's Star." These "kickbacks" were allowed in order to pay the employee additional salary and for work he was doing on Victor Keith Hill's campaign. Victor Keith Hill ordered that a Sheriff's Office employee be placed on paid administrative leave so that she could receive pay while not at work and while

travelling with Victor Keith Hill on personal trips.

1a
Between June 4, 2008 and June 7, 2008, Victor Keith Hill did in Clayton County commit the offense of THEFT BY TAKING in that Victor Keith Hill authorized payment from Clayton County Sheriff's Office funds for a cabin rental with Blue Ridge Cabin Rentals in Helen, Georgia for a personal trip unrelated to his official duties as Sheriff of Clayton County, and using fuel purchased by Clayton County for official use, did travel to Helen, Georgia using a Clayton County Sheriff's Office 2003 Ford Excursion, and did thereby unlawfully take property of Clayton County, with the intention of depriving Clayton County of the property.

1b
Between August 6, 2008 and August 11, 2008, Victor Keith Hill did in Clayton County commit the offense of THEFT BY TAKING in that Victor Keith Hill used a Clayton County Sheriff's Office 2003 Ford Excursion to travel to the State of Florida for a personal trip unrelated to his official duties as Sheriff of Clayton County, and did thereby unlawfully take property of Clayton County, with the intention of depriving Clayton County of the property.

1c
On or about August 6, 2008, Victor Keith Hill did in Clayton County commit the offense of THEFT BY TAKING in that Victor Keith Hill took Clayton County fuel from the county fuel pumps in Jonesboro, Georgia, and used said fuel for a personal trip to Florida unrelated to his official duties as Sheriff of Clayton County, and did thereby unlawfully take property of Clayton County, with the intention of depriving Clayton County of the property.

1d
On or about August 7, 2008, Victor Keith Hill did in Clayton County commit the offense of THEFT BY TAKING in that Victor Keith Hill used Clayton County funds to purchase goods in the amount of \$162.63 at Fort Pierce Cigo in Fort Pierce, Florida while on a personal trip unrelated to his official duties as Sheriff of Clayton County, and did thereby unlawfully take property of Clayton County, with the intention of depriving Clayton County of the property.

1e
On or about August 7, 2008, Victor Keith Hill did in Clayton County commit the offense of THEFT BY TAKING in that Victor Keith Hill used Clayton County funds to purchase \$42.59 in goods and services at a Radio Shack store in West Palm Beach Florida, said goods and services being for personal use and unrelated to his official duties as Sheriff of Clayton County, and did thereby unlawfully take property of Clayton County, with the intention of depriving Clayton County of the property.

1f

On or about August 8, 2008, Victor Keith Hill did in Clayton County commit the offense of THEFT BY TAKING in that Victor Keith Hill used Clayton County funds to purchase \$500.00 in goods and services at a Sprint/Nextel store in Florida, said goods and services being for personal use and unrelated to his official duties as Sheriff of Clayton County, and did thereby unlawfully take property of Clayton County, with the intention of depriving Clayton County of the property.

1g

On or about August 11, 2008, Victor Keith Hill did in Clayton County commit the offense of THEFT BY TAKING in that Victor Keith Hill used Clayton County funds to purchase goods in the amount of \$142.63 at BP Oil in Miami, Florida while on a personal trip unrelated to his official duties as Sheriff of Clayton County, and did thereby unlawfully take property of Clayton County, with the intention of depriving Clayton County of the property.

1h

Between August 25, 2008 and September 2, 2008, Victor Keith Hill did in Clayton County commit the offense of THEFT BY TAKING in that Victor Keith Hill used a Clayton County Sheriff's Office 2003 Ford Excursion to travel to the State of South Carolina for a personal trip unrelated to his official duties as Sheriff of Clayton County, and did thereby unlawfully take property of Clayton County, with the intention of depriving Clayton County of the property.

1i

Between September 10, 2008 and September 11, 2008, Victor Keith Hill did in Clayton County commit the offense of THEFT BY TAKING in that Victor Keith Hill used a Clayton County Sheriff's Office 2006 Dodge Charger to travel to the States of Alabama and Mississippi for a personal trip unrelated to his official duties as Sheriff of Clayton County, and did thereby unlawfully take property of Clayton County, with the intention of depriving Clayton County of the property.

1j

On or about September 10, 2008, Victor Keith Hill did in Clayton County commit the offense of THEFT BY TAKING in that Victor Keith Hill took Clayton County fuel from the county fuel pumps in Jonesboro, Georgia, and used said fuel for a personal trip to travel to the States of Alabama and Mississippi unrelated to his official duties as Sheriff of Clayton County, and did thereby unlawfully take property of Clayton County, with the intention of depriving Clayton County of the property.

1k
On or about September 10, 2008, Victor Keith Hill did in Clayton County commit the offense of THEFT BY TAKING in that Victor Keith Hill used Clayton County funds to purchase goods in the amount of \$58.91 at BP Oil in Bay Minette, Alabama while on a personal trip unrelated to his official duties as Sheriff of Clayton County, and did thereby unlawfully take property of Clayton County, with the intention of depriving Clayton County of the property.

1l
On or about September 11, 2008, Victor Keith Hill did in Clayton County commit the offense of THEFT BY TAKING in that Victor Keith Hill used Clayton County funds to purchase goods in the amount of \$70.37 at BP Oil in Hope Hull, Alabama while on a personal trip unrelated to his official duties as Sheriff of Clayton County, and did thereby unlawfully take property of Clayton County, with the intention of depriving Clayton County of the property.

1m
Between September 15, 2008 and September 16, 2008, Victor Keith Hill did in Clayton County commit the offense of THEFT BY TAKING in that Victor Keith Hill used a Clayton County Sheriff's Office 2006 Dodge Charger to travel to the State of Mississippi for a personal trip unrelated to his official duties as Sheriff of Clayton County, and did thereby unlawfully take property of Clayton County, with the intention of depriving Clayton County of the property.

1n
Between September 20, 2008 and September 21, 2008, Victor Keith Hill did in Clayton County commit the offense of THEFT BY TAKING in that Victor Keith Hill used a Clayton County Sheriff's Office Dodge 2006 Charger to travel to the State of Mississippi for a personal trip unrelated to his official duties as Sheriff of Clayton County, and did thereby unlawfully take property of Clayton County, with the intention of depriving Clayton County of the property.

1o
Between October 31, 2008 and November 5, 2008, Victor Keith Hill did in Clayton County commit the offense of THEFT BY TAKING in that Victor Keith Hill used a Clayton County Sheriff's Office 2006 Dodge Charger to travel to the State of North Carolina for a personal trip unrelated to his official duties as Sheriff of Clayton County, and did thereby unlawfully take property of Clayton County, with the intention of depriving Clayton County of the property.

1p
Between April 4, 2007 and December 31, 2008, Victor Keith Hill did in Clayton County commit the offense of THEFT BY TAKING in that Victor Keith Hill ordered and procured Clayton County Sheriff's Office employee Jonathan Newton, while on-duty and while being paid by Clayton County, to work on a book that Victor Keith Hill was writing, which was unrelated to his duties as Sheriff, and did thereby unlawfully take the service of Jonathan Newton, property of value, the property of Clayton County, with the intention of depriving Clayton County of the property.

1q
Between April 4, 2007 and August 6, 2008, Victor Keith Hill did in Clayton County commit the offense of THEFT BY TAKING in that Victor Keith Hill ordered and procured Clayton County Sheriff's Office employee Jonathan Newton, while on-duty and while being paid by Clayton County, to work on Victor Keith Hill's reelection campaign using Sheriff's Office offices and equipment and did thereby unlawfully take the service of Jonathan Newton, property of value, the property of Clayton County, with the intention of depriving Clayton County of the property.

1r
On or about May 19, 2007, Victor Keith Hill did in Clayton County commit the offense of THEFT BY TAKING in that Victor Keith Hill did thereby unlawfully take the services of Clayton County Sheriff's Office employees, while on duty and while being paid by Clayton County, by ordering, procuring and allowing said employees to work on the assignment of the "Sheriff Victor Hill Biker's Festival 2007," a fundraising event for the Committee to Reelect Victor Hill, and did thereby unlawfully take property of value, the property of Clayton County, with the intention of depriving Clayton County of the property.

1s
On or about May 19, 2007, Victor Keith Hill did in Clayton County commit the offense of THEFT BY TAKING in that Victor Keith Hill did thereby unlawfully take vehicles of the Clayton County Sheriff's Office, using fuel purchased by Clayton County for official use, to be used for the "Sheriff Victor Hill Biker's Festival 2007," a fundraising event for the Committee to Reelect Victor Hill, and did thereby unlawfully take property of value, the property of Clayton County, with the intention of depriving Clayton County of the property.

1t
On or about September 17, 2007, Victor Keith Hill did in Clayton County commit the offense of THEFT BY TAKING in that Victor Keith Hill did thereby unlawfully take the services of Clayton County Sheriff's Office employees, while on duty and while being paid by Clayton County, by ordering, procuring and allowing said employees to work on the assignment of the "The 2007 Sheriff Victor Hill Annual Golf Tournament," a fundraising event for the Committee to Reelect Victor Hill, and did thereby unlawfully

take property of value, the property of Clayton County, with the intention of depriving Clayton County of the property.

1u

On or about September 17, 2007, Victor Keith Hill did in Clayton County commit the offense of THEFT BY TAKING in that Victor Keith Hill did thereby unlawfully take vehicles of the Clayton County Sheriff's Office, using fuel purchased by Clayton County for official use, to be used for the "The 2007 Sheriff Victor Hill Annual Golf Tournament," a fundraising event for the Committee to Reelect Victor Hill, and did thereby unlawfully take property of value, the property of Clayton County, with the intention of depriving Clayton County of the property.

1v

On or about April 17, 2008, Victor Keith Hill did in Clayton County commit the offense of THEFT BY TAKING in that Victor Keith Hill did use the Clayton County Sheriff's Office DEA Shared Assets account to pay \$26,100.00 to Advantage Fulfillment Services, Inc. for printing services on the May 2008 "Sheriff's Star" publication, knowing that the actual cost for the printing services of the publication was less than \$26,100.00 and that Jonathan Newton would receive a refund from Advantage Fulfillment Services, Inc., and did thereby unlawfully take the funds of Clayton County, property of Clayton County, with the intention of depriving Clayton County of the property.

1w

On or about May 29, 2008, Victor Keith Hill did in Clayton County commit the offense of THEFT BY TAKING in that Victor Keith Hill did use the Clayton County Sheriff's Office General Ledger account to pay \$27,680.00 to Advantage Fulfillment Services, Inc. for printing services on the July 2008 "Sheriff's Star" publication, knowing that the actual cost for the printing services of the publication was less than \$27,680.00 and that Jonathan Newton would receive a refund from Advantage Fulfillment Services, Inc., and did thereby unlawfully take the funds of Clayton County, property of Clayton County, with the intention of depriving Clayton County of the property.

1x

On or about October 3, 2008, Victor Keith Hill did in Clayton County commit the offense of THEFT BY TAKING in that Victor Keith Hill did use the Clayton County Sheriff's Office Forfeited Drug Money account to pay \$37,928.93 to Advantage Fulfillment Services, Inc. for printing services on the October 2008 "Sheriff's Star" publication, knowing that the actual cost for the printing services of the publication was less than \$37,928.93 and that Jonathan Newton would receive a refund from Advantage Fulfillment Services, Inc., and did thereby unlawfully take the funds of Clayton County, property of Clayton County, with the intention of depriving Clayton County of the property.

1y

Between August 9, 2008 and September 19, 2008, Victor Keith Hill did in Clayton County commit the offense of THEFT BY TAKING in that Victor Keith Hill did

authorize a Sheriff's Office employee, to be placed on paid administrative leave when said employee was traveling on personal trips with Victor Keith Hill, and did thereby unlawfully take the funds of Clayton County, with the intention of depriving Clayton County of the property.

1z

Between September 20, 2008 and November 19, 2008, Victor Keith Hill did in Clayton County commit the offense of THEFT BY TAKING in that Victor Keith Hill did authorize a Sheriff's Office employee, to be placed on paid sick leave which was in fact not warranted, and while said employee was traveling with Victor Keith Hill and did thereby unlawfully take the funds of Clayton County, with the intention of depriving Clayton County of the property.

**2. FALSE STATEMENTS AND WRITINGS, CONCEALMENT OF FACTS, AND
FRAUDULENT DOCUMENTS IN MATTERS WITHIN JURISDICTION OF
STATE OR POLITICAL SUBDIVISIONS**

The Pattern

Between August 8, 2008 and September 19, 2008, Victor Keith Hill did cause a false writing to be made within the political subdivision of Clayton County, when he ordered and allowed that a Sheriff's Office employee, Beatrice Powell, be placed on paid administrative leave so that she could travel with Victor Keith Hill on personal trips. The status assigned to Beatrice Powell's absentee status, "administrative leave," was false and fictitious.

2a

Between August 8, 2008 and September 19, 2008, Victor Keith Hill did solicit, cause, and knowingly, allow a false, fictitious, and fraudulent statement and representation to be made, by causing and allowing the employee payroll records, to wit: The A-Team Daily Roster and the Clayton County ETM Live System Employee Time Card Detail Report of the Clayton County Sheriff's Office to reflect that Beatrice Powell was on administrative leave from August 8, 2008 and September 19, 2008, knowing the same to be a false, fictitious, fraudulent statement and representation, within the Clayton County Sheriff's Department, a department of a political subdivision of this State.

2b

Between September 20, 2008 and November 19, 2008, Victor Keith Hill did solicit, cause, and knowingly, allow a false, fictitious, and fraudulent statement and representation to be made, by causing and allowing the employee payroll records, to wit: The A-Team Daily Roster and the Clayton County ETM Live System Employee Time Card Detail Report of the Clayton County Sheriff's Office to reflect that Beatrice Powell was on sick leave from September 20, 2008 and November 19, 2008, knowing the same to be a false, fictitious, fraudulent statement and representation, within the Clayton

County Sheriff's Department, a department of a political subdivision of this State.

COUNT 3

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of: VIOLATION OF RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT

for that the said accused between the 7th day of January, 2007, and the 30th day of June, 2011, the exact date of the offense being unknown to the Grand Jury in Clayton County, Georgia, then and there:

through a Pattern of Racketeering Activity, acquire and maintain, directly and indirectly, an interest in and control of an Enterprise, real property, and personal property including United States currency, in violation of O.C.G.A. 16-14-4(a) contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT THREE of this Bill of Indictment expressly incorporates by reference, as if fully set forth therein, the allegations of the ENTERPRISE, the PATTERN OF RACKETEERING ACTIVITY, and the ACTS OF RACKETEERING ACTIVITY as enumerated in pages 16 through 18 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 4

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of: **VIOLATION OF RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT**

for that the said accused between the 1st day of January, 2007, and the 30th day of June, 2011, the exact date of the offense being unknown to the Grand Jury in Clayton County, Georgia, then and there:

associate with an Enterprise and did, through a Pattern of Racketeering Activity, directly and indirectly conduct and participate in the Enterprise, in violation of O.C.G.A. 16-14-4(b) contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT FOUR of this Bill of Indictment expressly incorporates by reference, as if fully set forth therein, the allegations of the ENTERPRISE, the PATTERN OF RACKETEERING ACTIVITY, and the ACTS OF RACKETEERING ACTIVITY as enumerated in pages 16 through 18 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

THE PATTERN OF RACKETEERING ACTIVITY

Victor Keith Hill engaged in an interrelated pattern of criminal activity motivated by and the effect of which was pecuniary gain.

While maintaining and interest and control of the COMMITTEE TO REELECT VICTOR HILL SHERIFF, Victor Keith Hill engaged in at least two ACTS OF RACKETEERING ACTIVITY, as defined by Official Code of Georgia Annotated (OCGA) §§ 16-14-3(8), 16-14-3(9)(A), and 16-14-3(9)(B), and as enumerated below.

PECUNIARY GAIN

Victor Keith Hill, through the PATTERN OF RACKETEERING ACTIVITY and proceeds derived therefrom, acquired and maintained an interest in and control of personal property including money in Clayton County. By virtue of his position as a political candidate for Sheriff of Clayton County, and by and through the acceptance of campaign contributions into the depository account entitled, COMMITTEE TO REELECT VICTOR HILL SHERIFF, Victor Keith Hill had opportunities, of which he took advantage, through the PATTERN OF RACKETEERING ACTIVITY, to obtain money and financial gain. While maintaining and interest and control of this account, Victor Keith Hill conducted financial transactions on this account in which he: illegally profited through a check drawn on this account and made payable by Victor Keith Hill to a corporation whose sole interest holder is Victor Keith Hill, illegally profited through a check drawn on this account and made payable by Victor Keith Hill to an associate of Victor Keith Hill who in turn provided a portion of these funds to Victor Keith Hill; illegally profited by depositing a check made payable to "Victor Hill" for a campaign contribution by depositing said check into his personal checking account with Bank of America.

All of the crimes and acts charged in COUNTS THREE AND FOUR, of this Bill of Indictment were committed between January 1, 2007 and June 30, 2011.

At least one of the ACTS OF RACKETEERING ACTIVITY occurred in Clayton County.

The ACTS OF RACKETEERING ACTIVITY (which, together, establish the PATTERN OF RACKETEERING ACTIVITY) engaged in by Victor Keith Hill had the same or similar intents, results, accomplices, victims and methods of commission, and were otherwise interrelated by distinguishing characteristics. The ACTS OF RACKETEERING ACTIVITY engaged in by Victor Keith Hill were not isolated incidents, but formed a PATTERN OF RACKETEERING ACTIVITY coordinated and directed toward the common objectives of facilitating the exploitation of the Committee

To Reelect Victor Hill's depository campaign account for personal financial gain.

CATEGORIES OF THE ACTS OF RACKETEERING ACTIVITY

The ACTS OF RACKETEERING ACTIVITY engaged in by Victor Keith Hill include, but are not limited to:

1. Violations of Article 1 of Chapter 8 of the Criminal Code of Georgia relating to theft (OCGA §16-8-2, THEFT BY TAKING and OCGA §16-8-4, THEFT BY CONVERSION);

ACTS OF RACKETEERING ACTIVITY

1. Theft

The Pattern

Between January 1, 2007 and June 30, 2011 Victor Keith Hill maintained an interest and control over his campaign reelection account entitled, Committee To Reelect Victor Hill Sheriff. The establishment of this account is required under O.C.G.A. §21-5-30(c), and all contributions to this account are to be disposed of pursuant to O.C.G.A. §21-5-33(a). Victor Keith Hill took campaign contributions that were to be lawfully used for a designated purpose, and converted them to his own use, thereby using said funds for an unlawful purpose. On August 14, 2008, Victor Keith Hill paid Naomi Nash, \$15,000.00 from this account under the guise that it was payment for Naomi Nash's service as his campaign manager. However, most of the money was returned to Victor Keith Hill after the funds were deposited and then withdrawn from Naomi Nash's personal account. Similarly, on November 14, 2008, Victor Keith Hill withdrew \$7,000.00 from this Committee To Reelect Victor Hill Sheriff account with a check made payable to Southern Resources, a Nevada Corporation, for which Victor Keith Hill is the only corporate officer. On November 17, 2008, Victor Keith Hill then wrote a check from Southern Resources, Inc. in the amount of \$7,000.00 to Eagle Optional, LLC, a limited liability partnership of which Victor Keith Hill is the only partner. On June 6, 2011, Victor Keith Hill deposited a campaign contribution from Soon Company Inc Beauty Master-Morrow in the amount of \$2,000.00 into his personal Bank of America account rather than the campaign account known as Committee To Reelect Victor Hill Sheriff. All of these funds were designated campaign funds to be used by Victor Keith Hill only to defray ordinary and necessary expenses incurred in connection with the candidate's campaign for elective office or his fulfillment or retention of office and not for personal financial gain. (O.C.G.A. §21-5-33(a))

1a
On or about August 14, 2011, Victor Keith Hill did in Clayton County, Georgia commit the offense of THEFT BY TAKING in that VICTOR KEITH HILL did unlawfully take \$15,000.00 from the Committee To Reelect Victor Hill Sheriff by a check made payable to Naomi Nash, for an unlawful purpose, and with the intent of depriving the Committee To Reelect Victor Hill Sheriff account from said funds.

1b
On or about November 14, 2011, Victor Keith Hill did in Clayton County, Georgia commit the offense of THEFT BY TAKING in that VICTOR KEITH HILL did unlawfully take \$7,000.00 from the Committee To Reelect Victor Hill Sheriff by a check made payable to Southern Resources, for an unlawful purpose, and with the intent of depriving the Committee To Reelect Victor Hill Sheriff account from said funds.

1c
On or about June 6, 2011, Victor Keith Hill did in Clayton County, Georgia commit the offense of THEFT BY TAKING in that VICTOR KEITH HILL did unlawfully take a \$2,000.00 check made payable to Victor Hill for the purpose of a campaign contribution and by depositing said check into his personal checking account, with the intent of depriving the Committee To Reelect Victor Hill Sheriff account from said funds.

COUNT 5

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL,

with the offense of:

THEFT BY TAKING

for that the said accused between the 4th day of June, 2008, and the 7th day of June, 2008, the exact date of the offense being unknown to the Grand Jury in Clayton County, Georgia, then and there:

did unlawfully take United States currency, the property of Clayton County, said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take said property while Sheriff of Clayton County, in breach of his duties as such officer and employee; in violation of O.C.G.A. § 16-8-2

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Five of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 1a on page 8 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 6

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of:

THEFT BY TAKING

for that the said accused between the 6th day of August, 2008, and the 11th day of August, 2008, the exact date of the offense being unknown to the Grand Jury in Clayton County, Georgia, then and there:

did unlawfully take a Clayton County Sheriff's Office vehicle, to wit: a 2003 Ford Excursion, the property of Clayton County, said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take said property while Sheriff of Clayton County, in breach of his duties as such officer and employee; in violation of O.C.G.A. § 16-8-2

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Six of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 1b on page 8 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 7

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of:

THEFT BY TAKING

for that the said accused on or about the 6th day of August, 2008 in Clayton County, Georgia, then and there:

did unlawfully take fuel from the Clayton County gas pumps, the property of Clayton County, said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take said property while Sheriff of Clayton County, in breach of his duties as such officer and employee; in violation of O.C.G.A. § 16-8-2

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Seven of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 1e on page 8 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 8

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of: THEFT BY TAKING

for that the said accused on or about the 7th day of August, 2008 in Clayton County, Georgia, then and there:

did unlawfully take \$162.63 in United States currency, the property of Clayton County, said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take said property while Sheriff of Clayton County, in breach of his duties as such officer and employee; in violation of O.C.G.A. § 16-8-2

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Eight of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 1d on page 8 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 9

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of:

THEFT BY TAKING

for that the said accused on or about the 7th day of August, 2008 in Clayton County, Georgia, then and there:

did unlawfully take \$42.59 in United States currency, the property of Clayton County, said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take said property while Sheriff of Clayton County, in breach of his duties as such officer and employee; in violation of O.C.G.A. § 16-8-2

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Nine of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 1e on page 8 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 10

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of: THEFT BY TAKING

for that the said accused on or about the 8th day of August, 2008 in Clayton County, Georgia, then and there:

did unlawfully take \$500.00 in United States currency, the property of Clayton County, said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take said property while Sheriff of Clayton County, in breach of his duties as such officer and employee; in violation of O.C.G.A. § 16-8-2

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Ten of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 11 on page 9 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 11

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of:

THEFT BY TAKING

for that the said accused on or about the 11th day of August, 2008 in Clayton County, Georgia, then and there:

did unlawfully take \$142.63 in United States currency, the property of Clayton County, said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take said property while Sheriff of Clayton County, in breach of his duties as such officer and employee; in violation of O.C.G.A. § 16-8-2

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Eleven of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 1g on page 9 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 12

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of: THEFT BY TAKING

for that the said accused between the 25th day of August, 2008, and the 2nd day of September, 2008, the exact date of the offense being unknown to the Grand Jury in Clayton County, Georgia, then and there:

did unlawfully take a Clayton County Sheriff's Office vehicle, to wit: a 2003 Ford Excursion, the property of Clayton County, said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take said property while Sheriff of Clayton County, in breach of his duties as such officer and employee; in violation of O.C.G.A. § 16-8-2

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Twelve of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 11 on page 9 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 13

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL,

with the offense of:

THEFT BY TAKING

for that the said accused between the 10th day of September, 2008, and the 11th day of September, 2008, the exact date of the offense being unknown to the Grand Jury in Clayton County, Georgia, then and there:

did unlawfully take a Clayton County Sheriff's office vehicle, to wit: a 2006 Dodge Charger, the property of Clayton County, said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take said property while Sheriff of Clayton County, in breach of his duties as such officer and employee; in violation of O.C.G.A. § 16-8-2

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Thirteen of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 1i on page 9 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 14

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of: THEFT BY TAKING

for that the said accused on or about the 10th day of September, 2008 in Clayton County, Georgia, then and there:

did unlawfully take fuel from the Clayton County fuel pumps, the property of Clayton County, said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take said property while Sheriff of Clayton County, in breach of his duties as such officer and employee; in violation of O.C.G.A. § 16-8-2

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Fourteen of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 1j on page 9 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 15

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of:

THEFT BY TAKING

for that the said accused on or about the 10th day of September, 2008 in Clayton County, Georgia, then and there:

did unlawfully take \$58.91 in United States currency, the property of Clayton County, said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take said property while Sheriff of Clayton County, in breach of his duties as such officer and employee; in violation of O.C.G.A. § 16-8-2

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Fifteen of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 1k on page 10 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 16

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of: THEFT BY TAKING

for that the said accused on or about the 11th day of September, 2008 in Clayton County, Georgia, then and there:

did unlawfully take \$70.37 in United States currency, the property of Clayton County, said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take said property while Sheriff of Clayton County, in breach of his duties as such officer and employee; in violation of O.C.G.A. § 16-8-2

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Sixteen of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 11 on page 10 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 17

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of:

THEFT BY TAKING

for that the said accused between the 15th day of September, 2008, and the 16th day of September, 2008, the exact date of the offense being unknown to the Grand Jury in Clayton County, Georgia, then and there:

did unlawfully take a Clayton County Sheriff's Office vehicle, to wit: a 2006 Dodge Charger, the property of Clayton County, said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take said property while Sheriff of Clayton County, in breach of his duties as such officer and employee; in violation of O.C.G.A. § 16-8-2

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Seventeen of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 1m on page 10 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 18

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of:

THEFT BY TAKING

for that the said accused between the 20th day of September, 2008, and the 21st day of September, 2008, the exact date of the offense being unknown to the Grand Jury in Clayton County, Georgia, then and there:

did unlawfully take a Clayton County Sheriff's Office vehicle, to wit: a 2006 Dodge Charger the property of Clayton County, said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take said property while Sheriff of Clayton County, in breach of his duties as such officer and employee; in violation of O.C.G.A. § 16-8-2

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Eighteen of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 1n on page 10 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 19

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of:

THEFT BY TAKING

for that the said accused between the 31st day of October, 2008, and the 5th day of November, 2008, the exact date of the offense being unknown to the Grand Jury in Clayton County, Georgia, then and there:

did unlawfully take a Clayton County Sheriff's Office vehicle, to wit: a 2006 Dodge Charger the property of Clayton County, said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take said property while Sheriff of Clayton County, in breach of his duties as such officer and employee; in violation of O.C.G.A. § 16-8-2

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Nineteen of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 1a on page 10 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 20

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of:

THEFT BY TAKING

for that the said accused between the 4th day of April, 2007, and the 31st day of December, 2008, the exact date of the offense being unknown to the Grand Jury in Clayton County, Georgia, then and there:

did unlawfully take the services of Clayton County Sheriff's employee Jonathan Newton, the property of Clayton County, by directly or indirectly ordering Jonathan Newton, while said employee was on-duty and while said employee was being paid by Clayton County, to work on a book that Victor Keith Hill was writing, said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take said property while Sheriff of Clayton County, in breach of his duties as such officer and employee; in violation of O.C.G.A. § 16-8-2

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Twenty of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 1p on page 11 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 21

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of: THEFT BY TAKING

for that the said accused between the 4th day of April, 2007, and the 6th day of August, 2008, the exact date of the offense being unknown to the Grand Jury in Clayton County, Georgia, then and there:

did unlawfully the services of Clayton County Sheriff's employee Jonathan Newton, the property of Clayton County, by directly or indirectly ordering Jonathan Newton, while said employee was on-duty and while said employee was being paid by Clayton County, to perform work on Victor Keith Hill's reelection campaign, said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take the property while Sheriff of Clayton County, in breach of his duties as such officer and employee; in violation of O.C.G.A. § 16-8-2

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Twenty-One of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 14 on page 11 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 22

On behalf of the citizens of the State of Georgia; do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of:

THEFT BY TAKING

for that the said accused on or about the 19th day of May, 2007 in Clayton County, Georgia, then and there:

did unlawfully take the services of Clayton County Sheriff's Office employees and Clayton County Sheriff's Office vehicles, the property of Clayton County, for the purpose of participating in a Committee to Reelect Victor Hill fundraising event entitled "Sheriff Victor Hill Biker's Festival 2007," said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take said property while Sheriff of Clayton County, in breach of his duties as such officer and employee, in violation of O.C.G.A. § 16-8-2

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Twenty-Two of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraphs 1r on page 11 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 23

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of:

THEFT BY TAKING

for that the said accused on or about the 19th day of May, 2007 in Clayton County, Georgia, then and there:

did unlawfully take Clayton County Sheriff's Office vehicles, the property of Clayton County, for the purpose of participating in a Committee to Reelect Victor Hill fundraising event entitled "Sheriff Victor Hill Biker's Festival 2007," said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take said property while Sheriff of Clayton County, in breach of his duties as such officer and employee; in violation of O.C.G.A. § 16-8-2

contrary to the laws of this State, the good order, peace and dignity thereof,

Count Twenty-Three of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 1a on page 11 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 24

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of:

THEFT BY TAKING

for that the said accused on or about the 17th day of September, 2007 in Clayton County, Georgia, then and there:

did unlawfully take the services of Clayton County Sheriff's Office employees and Clayton County Sheriff's Office vehicles and equipment, the property of Clayton County, for the purpose of participating in a Committee to Reelect Victor Hill fundraising event entitled "The 2007 Sheriff Victor Hill Annual Golf Tournament," said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take said property while Sheriff of Clayton County, in breach of his duties as such officer and employee; in violation of O.C.G.A. § 16-8-2.

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Twenty-Four of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 11 on page 11 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 25

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of:

THEFT BY TAKING

for that the said accused on or about the 17th day of September, 2007 in Clayton County, Georgia, then and there:

did unlawfully take Clayton County Sheriff's Office vehicles using fuel purchased by Clayton County for official use, the property of Clayton County, for the purpose of participating in a Committee to Reelect Victor Hill fundraising event entitled "The 2007 Sheriff Victor Hill Annual Golf Tournament," said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take said property while Sheriff of Clayton County, in breach of his duties as such officer and employee, in violation of O.C.G.A. § 16-8-2

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Twenty-Five of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 1a on page 12 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 26

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of:

THEFT BY TAKING

for that the said accused on or about the 7th day of April, 2008 in Clayton County, Georgia, then and there:

did unlawfully take United States currency, the property of Clayton County, from the Clayton County Sheriff's Office DEA Shared Assets account by check made payable to Advantage Fulfillment Services, Inc. knowing that said check exceeded the invoice from Advantage Fulfillment Services, Inc., said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take said property while Sheriff of Clayton County, in breach of his duties as such officer and employee; in violation of O.C.G.A. § 16-8-2.

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Twenty-Six of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 1v on page 12 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 27

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of:

THEFT BY TAKING

for that the said accused on or about the 29th day of May, 2008 in Clayton County, Georgia, then and there:

did unlawfully take United States currency, the property of Clayton County, from the Clayton County Sheriff's Office General Ledger account by check made payable to Advantage Fulfillment Services, Inc. knowing that said check exceeded the invoice from Advantage Fulfillment Services, Inc., said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take said property while Sheriff of Clayton County, in breach of his duties as such officer and employee; in violation of O.C.G.A. § 16-8-2

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Twenty-Seven of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 1w on page 12 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 28

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of: THEFT BY TAKING

for that the said accused on or about the 3rd day of October, 2008 in Clayton County, Georgia, then and there:

did unlawfully take United States currency, the property of Clayton County, from the Clayton County Sheriff's Office Forfeited Drug Money account by check made payable to Advantage Fulfillment Services, Inc. knowing that said check exceeded the invoice from Advantage Fulfillment Services, Inc., said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take said property while Sheriff of Clayton County, in breach of his duties as such officer and employee; in violation of O.C.G.A. § 16-8-2

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Twenty-Eight of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 1x on page 12 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 29

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of: THEFT BY TAKING

for that the said accused between the 9th day of August, 2008, and the 19th day of September, 2008, the exact date of the offense being unknown to the Grand Jury in Clayton County, Georgia, then and there:

did unlawfully take United States currency, the property of Clayton County, by ordering directly or indirectly that Beatrice Powell be placed on paid administrative leave, said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take said property while Sheriff of Clayton County, in breach of his duties as such officer and employee; in violation of O.C.G.A. § 16-8-2.

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Twenty-Nine of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 1y on page 12 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 30

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of: THEFT BY TAKING

for that the said accused between the 20th day of September, 2008, and the 19th day of November, 2008, the exact date of the offense being unknown to the Grand Jury in Clayton County, Georgia, then and there:

did unlawfully take United States currency, the property of Clayton County, by ordering directly or indirectly that Beatrice Powell be placed on sick leave, said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take said property while Sheriff of Clayton County, in breach of his duties as such officer and employee; in violation of O.C.G.A. § 16-8-2

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Thirty of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 1z on page 13 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 31

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of: **MAKING A FALSE STATEMENT**

for that the said accused between the 8th day of August, 2008, and the 19th day of September, 2008, the exact date of the offense being unknown to the Grand Jury in Clayton County, Georgia, then and there:

solicit, cause, and knowingly allow Clayton County Sheriff's Office employees to falsely state on a Clayton County Sheriff's Office employee payroll record that Beatrice Powell was on paid administrative leave thereby knowingly and willfully making a false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the Clayton County Sheriff's Office, a department of a political subdivision of this State in violation of O.C.G.A. § 16-10-20

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Twenty-Nine of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 2a on page 13 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 32

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of: MAKING A FALSE STATEMENT

for that the said accused between the 8th day of August, 2008, and the 19th day of September, 2008, the exact date of the offense being unknown to the Grand Jury in Clayton County, Georgia, then and there:

solicit, cause, and knowingly allow Clayton County Sheriff's Office employees to falsely state on a Clayton County Sheriff's Office employee payroll record that Bentrice Powell was on sick leave thereby knowingly and willfully making a false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the Clayton County Sheriff's Office, a department of a political subdivision of this State in violation of O.C.G.A. § 16-10-20

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Thirty of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 2b on page 13 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 33

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of: THEFT BY TAKING

for that the said accused on or about the 14th day of August, 2008 in Clayton County, Georgia, then and there:

did unlawfully take \$15,000.00, the property of the campaign deposit account for Committee to Reelect Sheriff Victor Hill, with the intention of depriving said owner of said property in violation of O.C.G.A. § 16-8-2

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Thirty-One of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 1a on page 18 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 34

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of: THEFT BY TAKING

for that the said accused on or about the 14th day of August, 2008 in Clayton County, Georgia, then and there:

did unlawfully take \$7,000.00, the property of the campaign deposit account for Committee to Reelect Sheriff Victor Hill, said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take said property while Sheriff of Clayton County, in breach of his duties as such officer and employee; in violation of O.C.G.A. § 16-8-2

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Thirty-Two of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETEERING paragraph 1b on page 18 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 35

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of: THEFT BY TAKING

for that the said accused on or about the 6th day of June, 2011 in Clayton County, Georgia, then and there:

did unlawfully take \$2,000.00, the property of the campaign deposit account for Committee to Reelect Sheriff Victor Hill, said unlawful taking being with the intention of depriving Clayton County of the property; further, Victor Keith Hill did take said property while Sheriff of Clayton County, in breach of his duties as such officer and employee; in violation of O.C.G.A. § 16-8-2

contrary to the laws of this State, the good order, peace and dignity thereof.

Count Thirty-Five of this Bill of Indictment incorporates by reference, as if fully set forth herein, the allegations set forth in ACTS OF RACKETBERING paragraph 1c on page 18 of this Bill of Indictment.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 36

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of: VIOLATION OF OATH BY PUBLIC OFFICER

for that the said accused between the 1st day of January, 2007, and the 31st day of December, 2008, in Clayton County, Georgia, then and there:

being Sheriff of Clayton County, a public officer and official, and having previously been administered the Official Oath of Sheriff as prescribed by law (OCGA 15-16-4), including that portion of the Oath stating that he will "take only my lawful fees," Victor Keith Hill did willfully and intentionally violate the terms of this Oath by taking United States currency, services, equipment, and vehicles of the Clayton County Sheriff's Office for purposes unrelated to his official duties as Sheriff in violation of O.C.G.A. § 16-10-1

contrary to the laws of this State, the good order, peace and dignity thereof.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney

COUNT 37

On behalf of the citizens of the State of Georgia, do hereby charge and accuse:

VICTOR KEITH HILL

with the offense of: INFLUENCING A WITNESS

for that the said accused on or about the 3rd day of September, 2011 in Clayton County, Georgia, then and there:

with the intent to deter Naomi Nash, a witness, from testifying freely, fully, and truthfully to a matter pending in front of the Special Purpose Grand Jury of Clayton County, did unlawfully offer and deliver services of an attorney and assistance with personal tasks while said Naomi Nash was incarcerated in the Harold Banks Detention Center, a benefit, reward, and consideration, to said witness in violation of O.C.G.A. § 16-10-93

contrary to the laws of this State, the good order, peace and dignity thereof.

Clayton Superior Court
November Term, 2011

Tracy Graham Lawson
District Attorney